

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	Chapter 13
Joseph Henderson	:	
	:	Case No. 23-10244-AMC
Debtor.	:	

**RESPONSE TO MOTION TO AVOID LIENS OF BRUTSCHER,
FOLEY, MILLINER, LAND & KELLY, LLP**

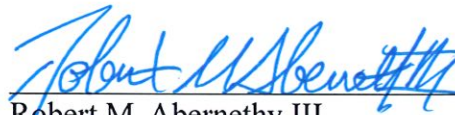
Brutscher, Foley, Milliner, Land & Kelly, LLP (the "Lienholder"), by and through its undersigned counsel, hereby submits its Response to Debtor's Motion to Avoid Lien, as follows:

1. Admitted.
2. Admitted in part and denied in part. It is admitted that Lienholder holds a judicial lien. The amount of said lien is denied as stated in this paragraph. To the contrary, the exact amount of the lien totals \$27,473.90.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied. It is specifically denied that the Additional Liens total approximately \$410,812.00. Strict proof is demanded at the hearing on this matter.
8. Denied. It is specifically denied that the exemptions in Debtor's assets do not exceed the limits provided under 11 U.S.C. §522(f). Strict proof is demanded at the hearing on this matter.
9. Denied. It is specifically denied that Lienholder's lien impairs the Debtor's exemptions allowed under the bankruptcy code, and it is specifically denied that Lienholder's

lien is avoidable. By way of further response, Lienholder believes and therefore avers that Debtor has undervalued the real property owned by Debtor located at 1001 Weible Drive, Coasteville, PA 19320.

WHEREFORE, the Lienholder, Brustcher, Foley, Milliner, Land & Kelly, LLP respectfully requests this Honorable Court enter an Order denying Debtor's instant Motion to Avoid Liens, and for such other relief as this Honorable Court deems just and proper.

Respectfully submitted,



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Counsel for Lienholder

Dated: July 31, 2023